

Before the
Federal Communications Commission
Washington D.C. 20554

In the Matter Of)	
)	
Section 63.71 Application of)	
)	WC Docket No. 16-399
LDMI Telecommunications, LLC)	
McLeodUSA Telecommunications Services, LLC)	
Network Telephone, LLC)	
PAETEC Communications, LLC)	
Talk America, LLC)	
The Other Phone Company, LLC)	
US LEC Communications, LLC)	
US LEC of Alabama, LLC)	
US LEC of Florida, LLC)	
US LEC of Georgia, LLC)	
US LEC of Tennessee, LLC)	
Windstream Communications Telecom, LLC)	
Windstream Communications, LLC)	
Windstream Direct, LLC)	
Windstream EN-TEL, LLC)	
Windstream Iowa-Comm, LLC)	
Windstream IT-Comm, LLC)	
Windstream Lakedale Link, Inc.)	
Windstream Norlight, LLC)	
Windstream NorthStar, LLC)	
Windstream NTI, LLC)	
Windstream NuVox Illinois, LLC)	
Windstream NuVox Indiana, LLC)	
Windstream NuVox Missouri, LLC)	
Windstream NuVox Ohio, LLC)	
Windstream NuVox, LLC)	
Windstream of the Midwest, Inc.)	
)	
For Authority Pursuant to Section 214 of)	
the Communications Act of 1934, As Amended,)	
to Discontinue the Provision of Service)	

REPLY COMMENTS OF WINDSTREAM SERVICES, LLC

On November 18, 2016, Windstream Services, LLC on behalf of its competitive local exchange carrier (“CLEC”) affiliates listed above (collectively “Windstream”), filed an application to discontinue the provision of local exchange and digital subscriber line (“DSL”)

services (collectively, “Services”) to approximately 300 customers in certain locations in the states of Alabama, Colorado, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kentucky, Louisiana, Michigan, Minnesota, Mississippi, Missouri, New Mexico, Ohio, Oregon, South Dakota, Texas, Utah, Washington and Wisconsin. On December 6, 2016, Windstream filed an amended application to correct certain inaccuracies included in the application filed on November 18, 2016 (the application filed November 18, 2016 and the amended application filed December 6, 2016 are referred to hereinafter as the “Application”).

In these reply comments, Windstream addresses unfounded concerns raised by commenters and requests that the Commission grant Windstream’s Application. As an initial matter, Windstream notes that the vast majority of commenters are not Windstream customers and are not affected by the proposed discontinuance. As explained in detail in Windstream’s Application, the discontinuance would impact a small number of customers who are served on equipment that is at the end of life, no longer supported by vendors and cost-prohibitive to replace.¹

Furthermore, Windstream’s proposed discontinuance does not result in the elimination of wireline services, as the majority of commenters allege. As a CLEC, Windstream is one of many providers offering wireline service in these areas. In fact, Windstream leases last-mile facilities from the underlying incumbent local exchange carrier (“ILEC”) to provide the Services it is seeking to discontinue. The ILECs are providing and will continue to provide wireline service to affected customers. Windstream’s proposed discontinuance is not intended and does not result in customers having to rely solely on wireless services for their communications needs, as some commenters assert.

¹ See Windstream amended application at 5.

Conclusion

The requested discontinuance is intended to address a small number of locations served by end-of-life equipment where upgrades are cost-prohibitive and customers have alternative wireline service providers from which to choose. The proposed discontinuance is reasonable and necessary, and Windstream has demonstrated that the public convenience and necessity will not be impaired. Windstream respectfully requests that the Commission approves its Application.

Respectfully Submitted,



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